

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,)
Plaintiffs,) Case No: 7:20-cv-00947-JD
vs.) CONSENT MOTION FOR
) EXTENSION OF TIME
)
COLLINS MURPHY, LIMESTONE)
COLLEGE, MG FREESITES, LTD., d/b/a)
PORNHUB.COM and HAMMY MEDIA)
LTD. d/b/a XHAMSTER.COM,)
Defendants.)
)

NOW COMES LIMESTONE UNIVERSITY (incorrectly identified as “Limestone College”), a Defendant to the above-captioned action, and hereby pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure moves the Court for an order extending the time within which Defendant Limestone may file a reply to Plaintiffs’ Fourth Motion to Amend/Correct the Complaint (“Plaintiffs’ Motion”) (ECF No. 145), showing the following:

1.

Plaintiffs filed and electronically served Defendant Limestone with Plaintiffs’ Motion on or about November 9, 2021.

2.

Pursuant to the Rules, Defendant Limestone Defendant Limestone’s reply to Plaintiffs’ Response is due on or about November 23, 2021.

3.

Upon conferring, Plaintiffs' counsel granted counsel for Defendant Limestone a fourteen (14) day extension to reply to Plaintiffs' Motion. Plaintiffs' counsel confirmed this extension in writing.

4.

This is the first extension granted to Defendant Limestone related to Plaintiffs' Motion. The new due date would be December 7, 2021.

5.

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings.

6.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, Defendant Limestone respectfully requests this Court grant Defendant Limestone's Motion and enter an order extending the time in which it may file a Reply by fourteen (14) days.

(SIGNATURES ON FOLLOWING PAGE)

This 19th day of November, 2021.

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II

JOSEPH Y. RAHIMI II

Federal ID No. 9670

JOHN A. HUBERT

Federal ID No. 13154

**ATTORNEYS FOR DEFENDANT
LIMESTONE UNIVERSITY**

33 Bull Street, Suite 590
Savannah, Georgia 31401
(912) 421-9988
jrahimi@rhp-law.com
jhubert@rhp-law.com

JENNIFER S. CLUVERIUS

SC Bar No. 74893

L. GRANT CLOSE III

(SC Bar No. 76030)

**ATTORNEYS FOR DEFENDANT
LIMESTONE UNIVERSITY**

NEXSEN PRUET, LLC

55 East Camperdown Way, Suite 400 (29601)
Post Office Drawer 10648
Greenville, South Carolina 29603-0648
Phone: (864) 370-2211
jcluverius@nexsenpruet.com
gclose@nexsenpruet.com

HAVING SEEN AND AGREED:

BELL LEGAL GROUP, LLC

/s/ J. EDWARD BELL, III

J. Edward Bell, III (#1280)

Joshua M. W. Salley (#13214)

COUNSEL FOR PLAINTIFFS

219 North Ridge Street
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@edbellsllp.com
jsalley@edbellsllp.com

**DOLT, THOMPSON, SHEPHERD &
CONWAY, PSC**

/s/ TYLER S. THOMPSON

Tyler S. Thompson (admitted *Pro Hac Vice*)

Liz J. Shepherd (admitted *Pro Hac Vice*)

Jordan A. Stanton (admitted *Pro Hac Vice*)

COUNSEL FOR PLAINTIFFS

13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
jstanton@kytrial.com

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing **CONSENT MOTION FOR EXTENSION OF TIME** has been served on counsel for all parties by placing same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereon and/or via electronic mail to all other counsel of record to ensure delivery to:

Attorney for Plaintiffs

J. Edward Bell, III
 Bell Legal Group, LLC
 219 North Ridge Street
 Georgetown, SC 29440

ebell@edbrellaw.com

Attorneys for Plaintiffs

Liz Jeanette Shepherd
 Jordan Alexander Stanton
 Tyler Smyth Thompson
 Dolt Thompson Shepherd and Conway
 PSC
 13800 Lake Point Circle
 Louisville, KY 40223

lshepherd@kytrial.com
jstanton@kytrial.com
tthompson@kytrial.com

Attorney for Plaintiffs

Joshua Michael Wesley Salley
 Bell Legal Group
 PO Box 2590
 Georgetown, SC 29442

jsalley@edbrellaw.com

Attorneys for Collins Murphy

Alan R Belcher Jr.
 Conner E. Johnson
 Hall Booth Smith, P.C.
 111 Coleman Boulevard, Suite 301
 Mount Pleasant, SC 29464

abelcher@hallboothsmith.com
cjohnson@hallboothsmith.com

Attorneys for MG Freesites

Marc E Mayer
 Mitchell Silberberg and Knupp LLP
 2049 Century Park East 18th Floor
 Los Angeles, CA 90067

mem@msk.com

Attorneys for MG Freesites

R. Taylor Speer
 J. Kenneth Carter
 Turner, Padgett, Graham and Laney, P.A.
 P.O. Box 1509
 Greenville, SC 29602

tspeer@turnerpadgett.com
kcarte@turnerpadgett.com

Attorneys for Limestone

Jennifer S. Cluveris
L. Grant Close III
Nexen Pruet, LLC
P.O. Drawer 10648
Greenville, SC 29603

jcluverius@nexsenpruet.com
gclose@nexsenpruet.com

This 19th day of November, 2021.

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II

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**ATTORNEYS FOR DEFENDANT
LIMESTONE**

33 Bull Street, Suite 590
Savannah, Georgia 31401
(912) 421-9988
jrahimi@rhp-law.com
jhubert@rhp-law.com